

advanced services as the wireline network.⁴⁵

Considering the amount of time it has taken to develop a cost model for wireline service, it is unlikely that the Commission could resolve all issues of model structure and inputs for conventional wireless service, much less for other alternatives such as microwave or satellite in the amount of time available. For the foreseeable future, supported services are more likely to be provided by wireline technologies, with alternative technologies being used only if they prove to be lower cost. Thus, using a wireline-only model for the time being is unlikely significantly to distort the market. The Commission should work on determining models for alternative technologies, but for now can use the wireline model without a cap.

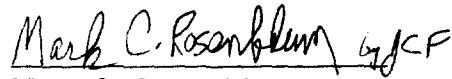
⁴⁵ Typically, wireless services deployed on a large scale overseas as an alternative to wireline service support only a fraction of the calling volumes per line handled by the typical United States wireline network.

VIII. CONCLUSION

For the reasons stated herein, the Commission should adopt the Hatfield Model's approach to determining outside plant placement.

Respectfully submitted,

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September 24, 1997

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on September 24, 1997.

A handwritten signature in cursive script, reading "Chris Frentrup", written over a horizontal line.

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CERTIFICATE OF SERVICE

I, Carolyn McTaw, do hereby certify that on this 24th day of September, 1997, I caused a copy of the foregoing Comments of AT&T Corp. and MCI Telecommunications Corporation to be served upon each of the parties listed on the attached Service List by U.S. First Class mail, postage prepaid.


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